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VIA ECF

February 8, 2022

Honorable Colleen McMahon
United States District Court
Southern District
500 Pearl Street
New York, New York 10007

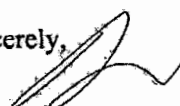
Re: U.S.A. v. Sanjay LaForest
21 Cr. 272 (CM)

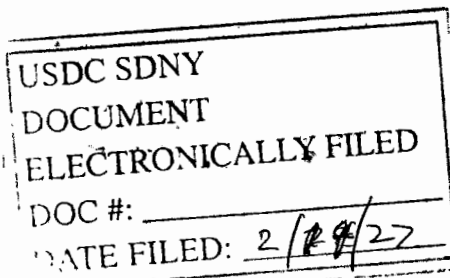
Dear Judge McMahon:

As you are aware, I represent the aforementioned defendant, Sanjay LaForest. The bail conditions presently limit Mr. LaForest's travel to the Southern and Eastern Districts of New York and to New Jersey. I am respectfully requesting a modification of the release order. I am hereby requesting that Mr. LaForest be allowed to travel to Florida from February 15th, 2022 to March 5, 2022. Your Honor approved a recent request for Mr. Laforest to travel to Florida in order to supervise a design project. That project was not completed and he is needed to continue supervising the project. The address and other details of the project have been provided to pre-trial services. Assistant United States Attorney Matthew Shahabian and Pre-Trial Services Officer Laura Gialanella have no objection to the proposed modification.

Please contact me if you have any questions or concerns.

Sincerely,


Brian Kaplan, Esq.



SO ORDERED:


Honorable Colleen McMahon

CC: AUSA Matthew Shahabian
(Via ECF)